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April 14, 2018

Marlene H. Dortch,

Secretary

Federal Communications Commission

445 12th Street, SW

Room TW-A325

Washington, D.C. 20554

RE: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310

Dear Ms. Dortch,

I write in support of the Emergency Waiver Petition filed by the Schools, Health & Libraries Broadband (SHLB) Coalition on April 3, 2018. This Petition asks the FCC to waive Section 54.675(a) of its Rules and fully fund qualified applications for Rural Health Care (RHC) funding for Funding Year 201 until the Commission completes the open rulemaking in WC Docket No. 17-310.

The RHC program funding cuts of 15 to 25 percent were much larger than anticipated and are effectively retroactive because they were not announced by USAC until more than eight months after the start of the funding year, much later than was reasonable or reasonably expected. As a result, health care providers across the nation that entered into contracts for eligible services effective at the start of FY 2017 (July 1, 2017) face immediate and significant financial hardship.

After fulfilling the Federal mandate of utilizing an Electronic Health Record database it became obvious that our existing statewide network infrastructure was outdated and unable to accommodate the new larger data flow across our narrow bandwidth. Faced with a growing need for a reliable high-speed, wide bandwidth network we knew going out to bid to find answers to our increasing needs was paramount. Also because of our increased remote program needs for the use of Telehealth and Telemedicine system bringing psychiatric professionals across our network for children's behavioral mental health programs we had to expand our networks capabilities. These needs in Alaska are absolute and ever increasing. Because of the vast size of the state and the difficulty of its terrain the best connectivity with statewide services is through our providers network infrastructure.

and ever increasing. Because of the vast size of the state and the difficulty of its terrain the best connectivity with statewide services is through our providers network infrastructure. Any reduction in RHC funding will severely affect our ability to provide program services to our locations because of an already limited funding by the state over the past several years. Our percentage of contribution for this usage is calculated and budgeted for annually and frankly, at this point any changes in the Federal funding will result in limited services or cutting of behavioral mental health services programs. The communities in all of Alaska are better served because of continued funding and especially central and Southcentral areas of greater population base.

Thank you for carefully considering our support of SHLB's emergency petition. While we hope long-term solutions to improve the Rural Health Care Program come from the open rulemaking docket, we must also urge the Commission to act to alleviate the more immediate problems being caused by the recent funding delays and shortages.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Marlow". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chief Operations Officer

Akeela Inc.

CC:

The Honorable Senator Murkowski

The Honorable Senator Sullivan

The Honorable Congressman Young